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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JONAH AMSEL; JULIO RIVERA; and,)	
EDUARDO MALTMAN,)	Case No.: 2:16-cv-00999-RFB-GWF
)	
Plaintiffs,)	
)	
vs.)	[PROPOSED] STIPULATION AND
)	ORDER FOR EXTENSION OF TIME
)	TO FOR PLAINTIFF'S TO RESPOND
)	TO DEFENDANT ARISTOTELIS
)	ELIADES' MOTION FOR SUMMARY
DOUGLAS G. GERRARD; DOLORES)	JUDGMENT
ELIADES; and, ARISTOTELIS ELIADES;)	
DOES I through X; and, ROES I through X')	[SECOND REQUEST]
inclusive,)	
Defendants.)	

Pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, Plaintiffs JONAH AMSEL, JULIO RIVERA, and EDUARDO MALTMAN ("Plaintiffs"), by and through their undersigned counsel, James P. Kemp, Esq. and Victoria L. Neal, Esq., of the law firm of Kemp & Kemp, and Defendant ARISTOTELIS ELIADES ("Defendant"), by and through his undersigned counsel, Gregory A. Miles, Esq., of the law firm of Royal and Miles, hereby stipulate, subject to approval by the Court, to extend the time for Plaintiffs to respond to Defendant's Motion For Summary Judgment.

This is the second request for an extension of time for Plaintiffs to respond to Defendant

Aristotelis Eliades' Motion for Summary Judgement. This quest is sought in good faith and not for purposes of undue delay.

I. RELEVANT FACTS

Discovery in this matter closed **June 16, 2017**. ECF No. 135. Because Plaintiffs' deposition were taken late in the process, including one on June 15, 2017, and the need for the transcripts to be reviewed and obtained, the parties stipulated to, and the court granted, an extension of the dispositive motion deadline to **September 5, 2017**. ECF No. 141. On **August 1, 2017**, Defendant Aristotelis Eliades' filed his motion for summary judgement. Plaintiffs' response deadline is **August 22, 2017**. ECF No. 143. Counsel for Plaintiffs and Defendant Aristotelis Eliades stipulated to an extension of Plaintiffs' deadline to respond up to and including September 19, 2017, which the Court granted. ECF No. 146. In the interim, Plaintiffs and the Defendants Dolores Eliades and Douglas Gerrard stipulated to extend the dispositive motion deadline up to and including September 19, 2017, which the Court granted. ECF No. 148. When the parties stipulated to extend the dispositive motion deadline for Defendants Dolores Eliades and Douglas Gerrard, Plaintiffs reached out to Defendant Aristotelis Eliades to request extending Plaintiffs responsive deadline again to account for the new conflict. **Id.** This stipulation follows as a result and Plaintiffs and Defendant Aristotelis Eliades hereby stipulate, subject to approval by the Court, that Plaintiffs deadline to respond be extended up to and including October 10, 2017.

II. REASON FOR EXTENSION

The extension is necessary primarily because of the extension of the dispositive motion deadline for the other two Defendants in this matter, but also includes Plaintiffs' counsels' heavy workload through September 15, 2017.

Therefore, the parties agree that an extension of time is appropriate and stipulate that Plaintiffs have up to and including October 10, 2017, subject to approval by the Court, in which to respond to Defendant Aristotelis Eliades' motion for summary judgment.

Respectfully submitted,

Dated this 15th day of September, 2017.

Dated this 15th day of September, 2017.

/s/ Gregory A. Miles

Gregory A. Miles, Esq.

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/s/ Victoria L. Neal

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ORDER

IT IS SO ORDERED:

Dated: September 18, 2017.



UNITED STATES DISTRICT COURT JUDGE
HONORABLE RICHARD F. BOULWARE

CERTIFICATE OF SERVICE

This is to certify on the date indicated below the within and foregoing document was served via the court's CM/ECF system to the following persons or parties:

All Parties Registered
Through the CM/ECF system.

Dated this 15th day of September, 2017.

/s/ Victoria L. Neal
VICTORIA L. NEAL, ESQ.